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UNITED AIR LINES, INC. and  
UAL CORPORATION

Additional Counsel Appear on Signature Page

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

McINTYRE GROUP, LTD.,  
on behalf of itself and all others  
similarly situated,

Plaintiff,

v.

AMR CORPORATION, AMERICAN  
AIRLINES, INC., BRITISH AIRWAYS  
PLC, UAL CORPORATION, UNITED  
AIRLINES, INC., and VIRGIN  
ATLANTIC AIRWAYS LIMITED,

Defendants.

CASE NO. CV 06-04056-EDL

**STIPULATION PURSUANT TO  
LOCAL RULE 6-1 TO EXTEND  
TIME TO RESPOND TO  
COMPLAINT**

Pursuant to Local Rule 6-1(a), Plaintiff McIntyre Group, Ltd. and  
Defendants AMR Corporation, American Airlines, Inc., British Airways Plc, UAL  
Corporation, United Air Lines, Inc., and Virgin Atlantic Airways Limited

1 respectfully request that this Court enter an order extending the time in which  
2 Defendants must answer or otherwise respond to this matter until the later of  
3 (1) the date when the Defendant would otherwise be required to file a response  
4 pursuant to Federal Rule of Civil Procedure 12, or (2) 45 days after the JPML rules  
5 on a motion pending in *In re International Air Transportation Surcharge Antitrust*  
6 *Litigation* (MDL No. 1793) and a consolidated complaint is filed by all Plaintiffs  
7 in the single transferee Court and served on the Defendant. Plaintiff McIntyre  
8 Group has consented to the requested extension. In support of this stipulation, the  
9 parties state:

10 1. The Complaint in this matter was filed on June 29, 2006. It seeks  
11 relief under the Sherman Act and the Clayton Act against three defendants on  
12 behalf of a putative class.

13 2. Nearly 50 similar actions have been filed in various jurisdictions  
14 around the country.

15 3. There is a motion pending before the Judicial Panel on Multidistrict  
16 Litigation (“JPML”) to consolidate and transfer actions like this one to a single  
17 venue. The JPML is considering this motion to consolidate in a matter captioned  
18 *In re Passenger Air Transportation Surcharge Antitrust Litigation*, MDL No.  
19 1793.

20 4. The parties have agreed that this stipulation does not constitute a  
21 waiver of any defenses, including but not limited to, the defenses of lack of  
22 personal jurisdiction, lack of subject matter jurisdiction, or improper venue. The  
23 Defendants expressly reserve their right to raise all defenses in response to either  
24 the current complaint or any consolidated amended complaint that may  
25 subsequently be filed relating to this action.

26 WHEREFORE, the parties request that this Court order that the time in  
27 which Defendants must answer or otherwise respond to this matter is the later of

(1) the date when the Defendant would otherwise be required to file a response pursuant to Federal Rule of Civil Procedure 12, or (2) 45 days after the JPML rules on a motion pending in *In re Passenger Air Transportation Surcharge Antitrust Litigation* (MDL No. 1793), and a consolidated complaint is filed by Plaintiffs in the single transferee Court and served on the Defendant.

Respectfully submitted,

Dated: July 20, 2006

THE FURTH FIRM, LLP

/s/

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*Attorneys for Plaintiff McIntyre Group, Ltd.*

Dated: July 20, 2006

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*Attorneys for Defendants United Air Lines,  
Inc. and UAL Corporation*

1  
2  
3  
4  
5 Dated: July 20, 2006  
6

SULLIVAN & CROMWELL LLP

7 /s/  
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*Attorneys for Defendant British Airways Plc*

16 Dated: July 20, 2006  
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18 /s/  
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Dated: July 20, 2006

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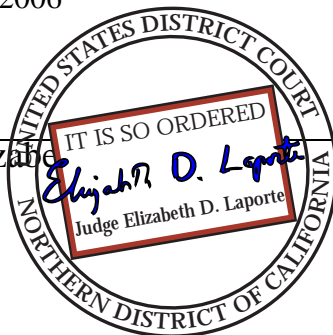
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*Attorneys for Defendants AMR Corporation  
and American Airlines, Inc.*

PURSUANT TO STIPULATION,  
IT IS SO ORDERED:

Date: July 20, 2006

Honorable Elizabeth D. Laporte



**PROOF OF SERVICE**

I am employed in Santa Clara County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is Two Palo Alto Square, Suite 300, Palo Alto, California 94306-2112.

On July 20, 2006, I served the foregoing document(s) described as U.S.

**STIPULATION PURSUANT TO LOCAL RULE 6-1 TO EXTEND TIME TO RESPOND TO COMPLAINT**

on each interested party, as follows:

- ☐ by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- ☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Palo Alto, California addressed as set forth below.
- ☐ by placing the document(s) listed above in a sealed facsimile & U.S. Mail envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a facsimile & U.S. Mail agent for delivery.
- ☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

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I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on July 20, 2006, at Palo Alto, California.

/s/  
Shana M. Ryan